

Be 3M



Be Good



Be Honest



Be Fair



Be Loyal



Be Accurate



Be Respectful

Message from Mike F. Roman



Great and enduring companies are driven by purpose, and built on a foundation of trust—trust from our customers, employees, partners, shareholders and communities. At 3M, we cannot break that trust—ever.

We've earned our reputation for integrity over many decades, and no one at 3M is free to compromise it. We owe it to all who count on us—especially our families and colleagues—to do business the right way, at all times and under all circumstances.

Every decision we make must be guided by our Code of Conduct. If you see something that doesn't look right, it is the responsibility of each of us to ask questions and raise concerns. Living and working by our values is fundamental to our continued success, as a company and as individuals.

Thank you for your commitment to doing business the right way.

Mike F. Roman

Chairman of the Board and Chief Executive Officer

Message from Ivan K. Fong



For over a century, 3M has built an extraordinary reputation for integrity and doing business the right way. Every day, you have the challenge, opportunity, and responsibility to maintain and enhance that reputation.

This responsibility is paramount: Nothing—not a request from a customer or a direct order from your manager, “making your operating plan” or personal loyalty—can or should justify compromising our collective commitment to integrity.

In addition, if you are a leader, you are responsible for creating a culture of compliance; for being a role model; for providing sufficient resources and training for compliance; for ensuring there are multiple channels to raise compliance concerns without fear of retaliation; and for promptly taking appropriate responsive actions when such issues are raised.

Perhaps most important, whether you are a supervisor or not, you do not shoulder this responsibility on your own. This handbook, for example, can help you spot issues and guide your decision-making under our Code of Conduct. Your manager, your Human Resources contacts, your assigned 3M Counsel, and our 3M Ethics & Compliance are among the many resources available to assist you.

Thank you in advance for your personal commitment to our Code of Conduct.

Ivan K. Fong

Senior Vice President, General Counsel and Secretary

Message from Michael Duran



Be 3M. It is what we do as a company and individuals to build on the ethical foundation of 3M. For more than a century, 3M has done things the right way, ensuring integrity is at the heart of what we do. We know that trust is an unwavering value that cannot be broken – trust in our employees, shareholders, customers and communities.

As a global company, we are facing new opportunities every day, which oftentimes come with added risks. Use the Code as your guide in this journey to answer questions and to solve ethical problems when the right choice may not be clear. It provides the foundation for the values we live by. These values can be felt all over the world.

It takes the collective effort of each one of us to make decisions every day to do the right thing, even when the choice is hard and things are not clear. It is always the right thing to do when you speak up and ask questions.

Michael Duran

Vice President, Chief Ethics & Compliance Officer
Ethics & Compliance

Code of Conduct



Be Good

Obey the law and 3M's Code of Conduct.



Be Honest

Act with honesty and integrity.



Be Fair

Play by the rules, whether working with government, customers, or suppliers.



Be Loyal

Protect 3M's interests, assets, and information.



Be Accurate

Keep complete and accurate business records.



Be Respectful

Respect one another and our social and physical environment around the world.

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Be 3M

An Introduction to Our Code

What does it mean to Be 3M? It means acting with honesty and integrity, making a difference in the lives of our customers, using our high ethical standards to create a competitive advantage for our Company, and creating an inclusive workplace for all.

Do Business the 3M Way

Around the world, customers rely on 3M to provide innovative solutions to advance companies, enhance homes and products that improve their lives. But we are defined by more than just what we make—we are defined by how we do business: the 3M Way, always making the right choices for our Company and our customers and protecting our reputation in all we do.

The Code of Conduct (“Code”) is part of the 3M Value Model, and positions 3M for long-term growth. Our Code summarizes the guidance provided in 3M’s principles, policies, standards, and procedures, which govern how we do business everywhere, every day. By living our Code, we create an inclusive workplace where each of us contributes to 3M’s vision. Our success depends on our integrity.

In some situations, the right choice might be clear. In more complex situations, our Code is here to provide guidance and insight for acting ethically. It also helps us know when to ask questions and where to get help when we need it.

In addition to meeting 3M’s high standards for integrity, we each have a responsibility to follow the laws and regulations that apply to the work we do and where we do business. If our Code conflicts with a local law, we should always obey the law. However, if the Code sets a higher standard for ethics and integrity than the law, we should follow the Code and get help from a resource listed in the “Be Good” section.

Meet High Standards

All **3M People** are held to the same high standards. If the Code sets a higher standard than the law, we are expected to follow the Code and do business the 3M Way.

Demonstrate High-Integrity Leadership—3M People

3M's success depends on each of us doing the right thing. No matter our job title, we are all leaders when it comes to ethics and integrity, and we must meet these important commitments:

- ▶ Know and follow the guidance set forth in our Code.
- ▶ Foster a positive, inclusive work environment and a strong culture of ethics.
- ▶ Complete compliance courses and certifications on time.
- ▶ Report suspected violations of the law or our Code unless prohibited to do so by local law.
- ▶ Do not engage in workplace retaliation.
- ▶ Report any known or suspected retaliation.
- ▶ Cooperate with investigations.

3M People

All employees, officers, and directors, and may include non-employee third parties who act on 3M's behalf, such as sales agents, representatives, consultants, contract workers, joint venture partners, distributors, converters, and outside counsel.

Demonstrate High-Integrity Leadership— Managers and Supervisors

We all play a key role in 3M's ethical culture. But if you are a **manager or supervisor**, you have some additional responsibilities, including:

Manager or Supervisor

Anyone who has direct reports.

- ▶ Set the tone and act as an ethical role model for everyone around you.
- ▶ Create an environment that encourages asking questions and raising concerns.
- ▶ Listen and report concerns appropriately, escalating them as needed and keeping in mind 3M's **escalation requirements**.
- ▶ Ensure those who report to you complete their compliance training courses and certification to the Code on time.
- ▶ Do your part to create a fair and respectful workplace.

For more information, see the following resources:

- ▶ **Compliance Principle**
- ▶ **Employee Obligations and Reporting Principle**
- ▶ **Policy Central**

Escalation Requirements

Some types of issues must always be escalated to another resource. If you are a manager or supervisor, be sure you understand your responsibilities in this area.

